

**STATEMENT IN
SUPPORT OF PROBABLE CAUSE**

IN RE: Lancey Paige CONNER

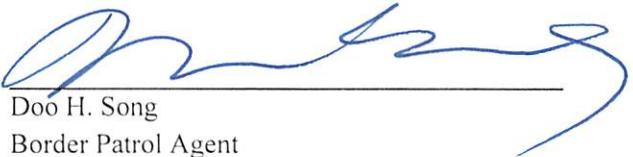
I, Doo H. Song, declare and state as follows:

1. On March 19, 2020, Lancey Paige CONNER was arrested at the United States Border Patrol checkpoint located on Interstate Highway 35 (IH-35) near Laredo, Texas in Webb County for attempting to transport 12 Illegal Aliens (IAs) in furtherance into the United States.
2. At approximately 4:45 p.m., A Border Patrol Agent (BPA) encountered Lancey Paige CONNER, a driver of a white tractor trailer, approaching the truck lane for inspection. The BPA observed signs of nervousness from CONNER by fidgeting in the driver seat, staring directly to the road, and gripping the steering wheel. The BPA asked CONNER if he could open the tool box compartment located behind the driver side door. CONNER exited the tractor, attempted to open the compartment by pulling the compartment door and stated "I do not have a key to open it". The BPA then referred CONNER to the Non-Intrusive Inspection (NII) area for an X-ray scan on the tractor trailer.
3. At the NII area, the X-ray scan of the tractor revealed several anomalies that resembled the silhouettes of human beings inside the cab of the tractor. Other BPA then proceeded to board the tractor and discovered 11 subjects hiding underneath a blanket on top of the bed of the sleeper. The other BPA then found one subject hiding inside the closet that is located behind the driver. The other BPA conducted an immigration inspection on all 12 subjects, and it was determined that they were citizens of Guatemala and Mexico with no legal documentation to be or remain in the United States. Lancey Paige CONNER and 12 subjects were placed under arrest and transported inside the checkpoint for further processing.
4. Lancey Paige CONNER was advised of a Miranda Warning via Service Form I-214 by BPA and was willing to provide a statement.
5. Lancey Paige CONNER stated that he was a United Stated citizen. CONNER stated that he had knowledge of the 12 passengers whom he had concealed inside the sleeper were IAs. CONNER stated that he was hired by an unknown man to get paid \$550.00 United States Dollars (USD) for transporting IAs to San Antonio, Texas. CONNER stated that he was instructed by the unknown man to drive to Azteca Drive in Laredo, Texas to pick up the IAs and to drive towards the checkpoint where he was arrested. CONNER stated that he transported the IAs because he needed money.
6. Henry Geovani VASQUEZ-Garcia was identified as a material witness in the case against Lancey Paige CONNER. VASQUEZ-Garcia freely admitted that he was a citizen of Guatemala who illegally entered the United States. VASQUEZ-Garcia stated that he made arrangements and paid \$100,000 Guatemalan Quetzales to cross the Rio Grande River and to be smuggled further into the United States. VASQUEZ-Garcia stated that he was heading to Tennessee. VASQUEZ-Garcia stated that after illegally crossing into the United States, he walked for about one or two minutes before being picked up by a black truck. VASQUEZ-Garcia stated that he was then taken to a house where he stayed for about two days. VASQUEZ-Garcia was later picked up by a red vehicle along with four others then taken to the white tractor. VASQUEZ-Garcia stated that he saw the driver of the tractor standing outside and waived him and his group to get in the back of the tractor. VASQUEZ-Garcia stated that he was in the tractor for about an hour and hid underneath some blackets. VASQUEZ-Garcia was presented a six-person photo lineups where he positively identify Lancey Paige CONNER as the driver of the white tractor.
7. Enrique MENDOZA-San Agustin freely admitted that he was a citizen of Mexico who illegally entered the United States. MENDOZA-San Agustin stated that he made arrangements and agreed to pay \$60,000 Mexican Pesos to be smuggled into the United States and taken to the state of Kentucky. MENDOZA-San Agustin stated that after illegally crossing into the United States, he walked through the brush for about three hours. MENDOZA-San Agustin stated he stayed hidden in the brush for three nights before being picked up by a white vehicle. MENDOZA-San Agustin was later taken to a house where he stayed for about two days. MENDOZA-San Agustin stated that he was later picked up by a car along with four others and taken to the tractor trailer on a neighborhood street. MENDOZA-San Agustin stated that he saw the driver of the tractor standing outside and waived him and his group to get in the back of the tractor. MENDOZA-

San Agustin was presented a six-person photo lineups and positively identify Lancey Paige CONNER as the driver of the white tractor.

I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on 03/21/2020 at Laredo, Texas.



Doo H. Song
Border Patrol Agent
United States Border Patrol

Having reviewed the foregoing declaration, I find probable cause that the defendant(s) named above committed an offense against the laws of the United States and may therefore be further detained pending presentment before a judicial officer.

Executed on _____ at _____.

Sam Sheldon
United States Magistrate Judge